

# UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

PAUL PORTER

**FILED**

2-22-08  
FEB 22 2008

CRIMINAL COMPLAINT

MAGISTRATE JUDGE NOLAN

CASE NUMBER:

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**08CR 0153**

I, Dominick A. Ciccola, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 21, 2008 in Cook county, in the Northern District of Illinois defendant PAUL PORTER did

by force and violence, and intimidation, take and attempt to take, from the person and the presence of others, money belonging to and in the care, custody, control, management, and possession, of the MB Financial Bank, 800 W. Madison St., Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

in violation of Title 18 United States Code, Section(s) 2113(a).

I further state that I am a(n) Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

Official Title

See attached affidavit

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Dominick A. Ciccola  
Signature of Complainant

Sworn to before me and subscribed in my presence,

February 22, 2008  
Date

at Chicago, Illinois  
City and State

Nan R. Nolan, U.S. Magistrate Judge  
Name & Title of Judicial Officer

Nan R. Nolan  
Signature of Judicial Officer

State of Illinois        )  
                                  )  
County of Cook        )

**AFFIDAVIT**

I, DOMINICK A. CICCOLA, first being duly sworn, state the following under oath:

1. I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI).

I have been a Chicago Police Officer for the past sixteen (16) years, and a Chicago Police Detective for the past six (6) years. I have been assigned to the FBI's Violent Crimes Task Force for approximately two years, conducting investigations of bank robberies, kidnappings, extortion and other violent crimes. I am an "Investigative or Law Enforcement Officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18.

**Introduction**

2. I make this affidavit from personal knowledge based upon my participation in this investigation, reports I have read, review of surveillance video, and conversations I have had with other witnesses and law enforcement agents who have personal knowledge of the events and circumstances described herein.

3. The information provided below is for the limited purpose of establishing probable cause to believe that on February 21, 2008, PAUL PORTER robbed the MB Financial Bank (the bank) located at 800 West Madison, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

4. Because the information outlined below is provided for the limited purpose of

establishing probable cause, it does not contain all details or all facts of which I am aware relating to this investigation. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part and are not verbatim.

#### **Offense Conduct**

5. On February 21, 2008, at approximately 12:12 p.m., a black male, later identified as PORTER, entered the bank and approached a bank teller (Teller A). Teller A asked PORTER if she could help him. PORTER then produced his wallet and removed an identification. PORTER then stated, "I'm drunk, lower the money, give me \$2,000.00 right now in one hundred dollar bills. Right now, I don't want to hurt anyone!" Teller A made eye contact with, and nodded to, the bank's security guard (Guard 1).

6. Guard 1 is a retired Chicago Police Officer working as a security guard for MB Financial Bank. At the time of the robbery, Guard 1 was armed and in a uniform. Guard 1 was in the bank lobby when he observed PORTER at Teller A's window. According to Guard 1, Teller A nodded and made eye contact with him (Guard 1). Guard 1, believing that Teller A was informing him of a bank robbery, approached PORTER and drew his handgun. Guard 1 ordered PORTER not to move, forced PORTER to the floor, and re-holstered his weapon.

7. According to Guard 1, PORTER got up from the floor and placed his hand inside his jacket pocket as if he had a gun, causing Guard 1 to re-draw his handgun. Guard 1 again forced PORTER to the floor and reholstered his gun. According to Guard 1, PORTER told Guard 1 that he had a gun, and stated, "Come on Mother Fucker, get some!" Guard 1 then redrew his weapon and pointed it at PORTER. PORTER backed away from the Guard and reached over the counter and removed money from a teller drawer. To avoid further confrontation in the bank, Guard 1 allowed PORTER to exit the bank.

8. Bank employees inside the bank during the robbery called 911 to report the robbery to the police. The bank employees described the robber as a tall black male wearing a black hooded jacket.

9. Chicago Police Officers responding to the robbery were directed, by an unidentified witness on the scene, to a restaurant where the witness had seen a person, matching the description of the robber, enter. The restaurant was approximately one and one half blocks from the bank. Chicago Police Officers entered the restaurant and located PORTER based upon the description given in the 911 call. Guard 1 was transported to the restaurant where he identified PORTER as the individual that had robbed the MB Financial Bank approximately fifteen minutes earlier. PORTER was then transported back to the MB Financial Bank where he was identified as the robber by a bank employee who was present during the robbery. At the time of his arrest PORTER was in possession of \$18.00 and was wearing a black hooded jacket.

10. Following the robbery, I reviewed the bank surveillance video recorded during the robbery. I have also seen PORTER in person. The robber's face is visible in the bank surveillance video and is that of PORTER.

11. An audit conducted by bank personnel following the robbery revealed that \$213.00 was missing from the bank after the robbery.

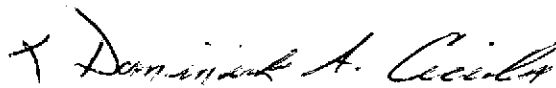
12. On February 21, 2008, the MB Financial Bank was an institution whose deposits are insured by the Federal Deposit Insurance Cooperation (FDIC).

#### Conclusion

13. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that PAUL PORTER did, by force and violence, and by intimidation, take from the person and presence of bank employees, money belonging to and in the care, custody,

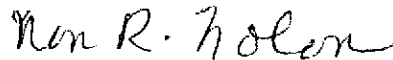
control, management, and possession of MB Financial Bank, 800 West Madison, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.



DOMINICK A. CICCOLA  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to before me  
this 22nd day of February, 2008



Nan R. Nolan  
U.S. Magistrate Judge